

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

CROWN BAY MARINA, L.P.,)	
)	
Plaintiff,)	Case No. 3:18-cv-00068-CVG-RM
)	
v.)	
)	
SUBBASE DRYDOCK, INC.,)	
M/V <i>Caribena</i> USCG Doc. No. 1153441,)	
and her tackle, gear, apparel, and appurtenances,)	
<i>In rem</i> ,)	
)	
Defendant.)	
<hr/>)	
CROWN BAY MARINA, L.P.,)	
)	
Plaintiff,)	Case No. 3:18-cv-00073-CVG-RM
)	
v.)	
)	
REEF TRANSPORTATION, LLC, and)	
MORNING STAR-VICL a 25' Water Taxi)	
her tackle, gear, apparel & appurtenances)	
in rem, and EVENING STAR- VICL, a 25')	
Water Taxi and her tackle, gear, apparel &)	
Appurtenances, in rem,)	
)	
Defendants.)	
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FOURTH NOTICE OF RULE 30(b)(6) DEPOSITION OF CROWN BAY MARINA, L.P.

To: Crown Bay Marina, L.P.
c/o A. Jeffrey Weiss, Esq.
A.J. Weiss & Associates
6934 Vessup Lane
St. Thomas, VI 00802

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, defendant Reef Transportation, LLC (“Reef”), through its undersigned attorneys, will take the deposition of plaintiff Crown Bay Marina, L.P. (“CBM”), at the offices of Dudley Newman Feuerzeig LLP, 1336 Beltjen Road, Suite 101, St. Thomas, VI 00802, on July 29, 2019 at 9:00 a.m. and continuing from that time until completed.

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The deposition will be by oral examination before a notary public or duly authorized officer and will be recorded by sound and stenographic means.

Pursuant to Fed. R. Civ. P. 30(b)(6), the matters to be addressed at the deposition include the following:

1. All facts and documents regarding the status of CBM's lease with the Virgin Islands Port Authority covering the improved premises commonly known as "Crown Bay Marina" located at 8168 Subbase (a/k/a Parcel Nos. 168 and 169), Crown Bay, St. Thomas, U.S. Virgin Islands (the "Premises").
2. All facts and documents regarding the claims alleged in CBM's verified complaint filed in this case;
3. All facts and documents regarding the Rule 26 disclosures made by CBM in this case;
4. All facts and documents regarding CBM's answers/responses to interrogatories and requests for production of documents in this case;
5. All facts and documents regarding the execution of License Agreements For Dockage and 2017 Hurricane Evacuation Protocols (collectively, the "2017 License Agreement") attached as Exhibit A to CBM's verified complaint in this case;
6. All facts and documents regarding how, if at all, the 2017 License Agreement differed from license agreements and hurricane evacuation protocols used by CBM in the years from 2011 to 2017;
7. All facts and documents regarding any damages to the Premises as a result of Hurricanes Irma and Maria, the causes of such damages, and any insurance coverage for such damages;

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8. All facts and documents regarding any damages to the Premises proximately caused by Reef's vessels;

9. All facts and documents regarding any communications between CBM and the Virgin Islands Port Authority regarding any damages to the Premises as a result of Hurricanes Irma and Maria, the causes of such damages, and any insurance coverage for such damages;

10. All facts and documents regarding any communications between CBM and Clyde Tapp and/or Herman van der Heide regarding any damages to the Premises as a result of Hurricanes Irma and Maria, and the causes of such damages; and

11. All facts and documents regarding subparts (iii) through (vi) of CBM's Answer to Reef's Interrogatory No. 11.

12. All facts and documents regarding the structural capacity of CBM's docks on the Premises including all structural drawings of the CBM marina facilities, the construction code used, the design loads used, safety factors and structural details of all connections between different elements of the docks.

DUDLEY NEWMAN FEUERZEIG LLP

DATED: July 17, 2019

By: s/ Gregory H. Hodges
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Attorneys for Reef Transportation, LLC

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CERTIFICATE OF SERVICE

It is hereby certified that on this 17th day July, 2019, I electronically filed the foregoing **Fourth Notice of Rule 30(b)(6) Deposition of Crown Bay Marina, L.P.** with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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